

OPEN MEETING AGENDA ITEM

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION



0000118739

COMMISSIONERS

KRISTIN K. MAYES, Chairman
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

RECEIVED

2010 OCT 12 P 2:02

DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

OCT 12 2010

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
APPROVAL OF THE COMPANY'S 2011
DEMAND SIDE MANAGEMENT
IMPLEMENTATION PLAN.

DOCKET NO. E-01345A-10-0219

**COMMENTS OF WESTERN RESOURCE
ADVOCATES ON APS' CONSUMER
PRODUCTS PROGRAM ENHANCEMENTS:
CFL GIVE-AWAY.**

Western Resource Advocates (WRA) hereby submits comments on Arizona Public Service Company's (APS') Consumer Products Program Enhancement in which APS will increase the number of compact fluorescent lamps (CFLs) to be given away to 150,000 per year.¹

To meet the energy efficiency goals approved by the Commission in APS' last rate case and to meet the requirements of the efficiency standard rule, it will be necessary to dramatically expand customer participation in efficiency programs at reasonable cost. Utilizing community-based organizations to deliver energy savings will help expand efficiency program participation. These organizations' programs are successful because they make use of social networks, civic engagement, and enthusiastic volunteers. APS' CFL give-away program reinforces the role of community-based organizations and could be of even greater value with the modification proposed below.

Distribution of CFLs to consumers can be carried out in several ways, including:

- Large scale programs in which community-based organizations give CFLs to residential consumers, going door-to-door or distributing lamps at community events.
- Local community efficiency programs such as those sponsored by Interfaith Power and Light or neighborhood organizations in which CFLs are given to members.
- Municipal/neighborhood programs where volunteers educate consumers about energy efficiency and install efficiency measures in participants' homes.

Table 1 provides information on several CFL programs or program elements. These programs include pilot projects as well as full-scale programs. In some cases, the CFLs were installed by volunteers in participants' homes, in some cases consumers were given the CFLs to install themselves, and in some

¹ This proposed program enhancement appears on page 10 of APS' Demand Side Management Implementation Plan for 2011, dated June 1, 2010. APS proposes to increase the annual limit on the number of "give-away" CFL bulbs from 30,000 to 150,000 annually. Some of these free CFLs are given away at events such as home shows, community events, trade shows, etc. APS plans to give away 75,000 CFLs in 2011 in support of these types of events. APS also plans to give CFLs to local charitable organizations and non-profit community groups which will in turn give away the CFLs. APS plans to make 75,000 CFLs available for donations to qualifying organizations in 2011, awarding up to 1,000 bulbs per request.

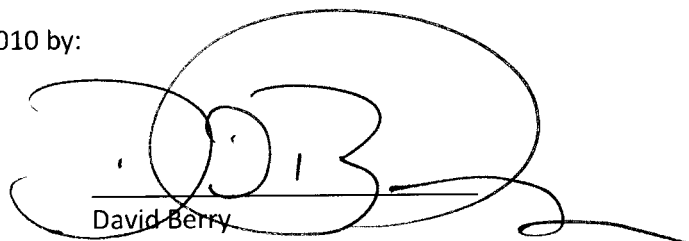
cases consumers purchased CFLs. Community-based efficiency programs can be short term efforts, lasting a few weeks, or multi-year activities. Note that some programs distributed thousands of CFLs.

Table 1. Examples of Community-Based CFL Programs²

Program	Pilot?	Scale of Operations
Baltimore Neighborhood Energy Challenge	Yes	First year pilot: 8 neighborhoods, 100 volunteers, 750 participants: 77% installed CFLs, 46% turned down water heater temperature, 44% added caulking & weather stripping, 41% wrapped their water heater.
Vermont Community Energy Pilot	Yes	January to April 2009: 243 volunteers visited 709 residences and installed 6449 measures, of which 4536 were CFLs. Efficiency Vermont provided measures free for direct installation.
Project Porchlight: Puget Sound	No	Summer and early fall of 2009: 1,100 volunteers, with funding from Puget Sound Energy, distributed 275,000 free CFLs to residents door-to-door and at more than 120 community events. 61 community groups, 27 businesses, 16 churches, 23 schools helped distribute CFLs.
Vermont Lighting Challenges	No	Short term programs. Manchester: 42,000 CFLs purchased. Middlebury: 7,000 CFLs replaced incandescent lamps (some were free, some sold). Poultney: 96% of households replaced an incandescent lamp with a CFL (some were free, some sold).

WRA recommends that the Commission approve APS' proposal, but permit APS to give away as many as 500,000 CFLs per year with no formal limit on the number of CFLs allocated to a particular nonprofit or charitable organization. WRA also recommends that, in preparing its 2012 implementation plan, APS consider providing technical assistance to community-based organizations requesting more than 5,000 CFLs to strengthen the organizations' programs and increase their roles in delivering energy savings.

Respectfully submitted this 8th day of October, 2010 by:


 David Berry
 Chief of Policy Analysis
 Western Resource Advocates
 PO Box 1064
 Scottsdale, AZ 85252-1064

Original and 13 copies mailed to Docket Control, Arizona Corporation Commission, 1200 W. Washington St., Phoenix, AZ 85007. Electronic copies to parties of record.

² Sources: Baltimore Neighborhood Energy Challenge, *Phase 1 Report*, Baltimore, MD, 2010, <http://cleanergreenerbaltimore.org/uploads/files/BNEC%20Pilot%20Results%20Report.pdf>. Efficiency Vermont, *Vermont Community Energy Efficiency Pilot Project*, Burlington, VT, 2009. Project Porchlight, Puget Sound, www.projectporchlight.com/pugetsound-summary. Efficiency Vermont, Case Studies, *The Manchester Challenge*, *The Poultney*, *Vermont Change a Light Challenge*, and *The 72 Hours of Light*, Burlington, VT, no date.